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8 **UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

9 UNITED STATES OF AMERICA,  
10  
Plaintiff,

11 vs.

12 BRENDA TOLENTINO-ESTRADA  
13 Defendant.

Case No. 2:20-cr-004-RFB-VCF-1

Stipulation for Extension of Discovery  
Deadline

14  
15 IT IS HEREBY STIPULATED AND AGREED, by and between Nicholas A.  
16 Trutanich, United States Attorney, Travis Leverett, Assistant United States Attorney,  
17 counsel for the United States of America and Heidi Ojeda, counsel for defendant Brenda  
18 Tolentino-Estrada:

19 THAT THE DISCOVERY DEADLINE CURRENTLY SET FOR March 13,  
20 2020 be vacated and set to April 13, 2020 to reflect the Court's continuance of the trial date  
21 in this matter. *See* ECF 22.

22 This stipulation is entered into for the following reasons:

- 23 1. The government is waiting to obtain the results of a fingerprint analysis that was  
24 conducted on packages found in the defendant's car.

- 1 2. The Court granted the parties' Stipulation (ECF No. 22), extending the trial dates in  
2 this case.
- 3 3. Defense counsel and counsel for the government agree to the extension of time and  
4 further agree that defense counsel may file any substantive motions related to the  
5 outstanding discovery after receiving that discovery.
- 6 4. Denial of this request for extension of time could result in a miscarriage of justice.
- 7

8 Dated this 12th day of March 2020.

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10 Respectfully Submitted,

11 NICHOLAS A. TRUTANICH  
United States Attorney

12 /s/ Travis Leverett  
13 TRAVIS LEVERETT  
Assistant United States Attorney

14 /s/ Heidi Ojeda  
15 HEIDI OJEDA  
16 Counsel for Brenda Tolentio-Estrada

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FINDINGS OF FACT

Based on the pending Stipulation of counsel, and good cause appearing therefore,  
the Court finds that:

1. The period within which the government may produce discovery is hereby  
extended from March 13, 2020 to April 13, 2020
2. Counsel for the defendant may file substantive motions related to the  
outstanding discovery after having reviewed such discovery.
3. The government is waiting to obtain the results of a fingerprint analysis that was  
conducted on packages found in the defendant's car.

4. Both counsel for the defendant and counsel for the government agree to the continuance.

For all of the above-stated reasons, the ends of justice would best be served by an extension of the discovery deadline.

ORDER

IT IS ORDERED that the discovery deadline currently scheduled for March 13, 2020 be extended to April 13, 2020.

DATED this 12th day of March 2020.



RICHARD F. BOULWARE, II  
UNITED STATES DISTRICT JUDGE